

REMARKS

With the addition of new claims 27 to 29, claims 1 to 29 are pending and being considered. It is respectfully submitted that all of the presently pending claims are allowable, and reconsideration of the present application is respectfully requested.

Applicant thanks the Examiner for considering the previously filed Information Disclosure Statement, PTO-1449 paper, and cited references.

As an initial matter, the title has been amended to correct a typographical error.

Claims 1 to 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Application Publication No. 2004/0001565 (the “Jones” reference) in view of U.S. Patent Application Publication No. 2003/0041125 (the “Salomon” reference).

To reject a claim as obvious under 35 U.S.C. § 103, the prior art must disclose or suggest each claim feature and it must also provide a motivation or suggestion for combining the features in the manner contemplated by the claim. (*See Northern Telecom, Inc. v. Datapoint Corp.*, 908 F.2d 931, 934 (Fed. Cir. 1990), *cert. denied*, 111 S. Ct. 296 (1990); *In re Bond*, 910 F.2d 831, 834 (Fed. Cir. 1990)). Thus, the “problem confronted by the inventor must be considered in determining whether it would have been obvious to combine the references in order to solve the problem,” *Diversitech Corp. v. Century Steps, Inc.*, 850 F.2d 675, 679 (Fed. Cir. 1998).

Claim 1 relates to a system to provide automated services to heterogeneous devices in a network environment. Claim 23 relates to a method to provide automated services to heterogeneous devices in a network environment across multiple platforms. Claim 25 relates to a system to provide automated services to heterogeneous devices in a network environment across multiple platforms. Each of claims 1, 23, and 25 provides for *registering and synchronizing devices*.

The Office Action asserts that paragraphs 0004-0007 of the “Jones” reference disclose registering devices. The cited section of the “Jones” reference is unrelated to registration of heterogeneous devices. Instead, the cited section provides for using a portlet as “a content channel or application to which *the end-user can subscribe*.” *See* the “Jones” reference, paragraph 0006. Portlets are defined by the “Jones” reference as “the visible active components included as part of portal pages . . . each portlet in a portal occupies a portion of the portal page through which the portlet can display associated content from a portlet channel.” *See* the “Jones” reference, paragraph 0005. Therefore, “the end-user” subscription

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(to which the Examiner refers as assertedly disclosing registering as provided for in the context of claims 1, 23, and 25) is an *end-user account* through which the portal “distribute[s] content and applications through a unified interface in a personalized manner according to the preferences of the end-user,” and is unrelated to device registration. *See* the “Jones” reference, paragraph 0006. Moreover, any review of the secondary “Salamon” reference makes plain that it does not correct this deficiency of the “Jones” reference, so that the combination of the “Jones” and “Salamon” references does not disclose or suggest each feature of any of claims 1, 23, and 25, so that each of claims 1, 23, and 25 and their dependent claims, e.g., claims 2 to 22, 24, and 26, respectively, are allowable.

As further regards claims 23 and 25, the claims include the feature of registration of the devices *to record device capabilities of each of the devices*. The Office Action wholly ignores this feature of claims 23 and 25. Indeed, it is respectfully submitted that the combination of the “Jones” and “Salamon” references do not disclose or suggest this feature. As explained above, the “Jones” reference provides for user subscriptions and simply does not disclose device registration, and certainly does not disclose device registration where device capabilities are recorded, as provided for in the context of the claim. Since the secondary “Salamon” reference does not correct this critical deficiency of the “Jones” reference, the combination of the “Jones” and “Salamon” references does not disclose or suggest each feature of claim 23 or claim 25 for this additional reason. Accordingly, claims 23 and 25 and their respective dependent claims 24 and 26 are allowable for this additional reason.

Withdrawal of the obviousness rejections of claims 1 to 26 is therefore respectfully requested.

New claims 27 to 29 do not add any new matter and are supported in the specification. Claims 27 to 29 depend from claim 1 and are therefore allowable at least for the same reasons as claim 1.

Accordingly, all of pending claims 1 to 29 are allowable.

Conclusion

In view of the foregoing, it is respectfully submitted that all of claims 1 to 29 are allowable. It is therefore respectfully requested that the rejections (and any objections) be withdrawn. Prompt reconsideration and allowance of the present application are therefore respectfully requested.

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Respectfully submitted,

By:

Gerard A. Messina
(Reg. No. 35,952)

KENYON & KENYON LLP
One Broadway
New York, New York 10004
(212) 425-7200

33,865
Reg. No.
Aaron C
DRAFTING

CUSTOMER NO. 26646